

ORIGINAL

BELLSOUTH

BellSouth
Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351

kathleen.levitz@bellsouth.com

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463-4113
Fax 202 463-4198

RECEIVED

JAN 18 2000

EX PARTE OR LATE FILED

WRITTEN EX PARTE

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

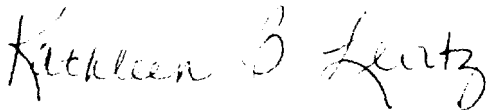
Re: Written Ex Parte in CC Docket No. 98-121
and CC Docket No. 99-295

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has made a written ex parte to Claudia Fox, a senior attorney in the Common Carrier Bureau's Policy and Program Planning Division, with copies of that ex parte going also to William Agee and Jake Jennings. That ex parte consists of a copy of an Order that on January 12, 2000 the Georgia Public Service Commission adopted in its Docket No. 8354-U: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems, Consideration of AT&T's Motion for Reconsideration of the Commission's Order for Third Party Testing.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, for each of the dockets identified above, we are filing two copies of this notice and that written ex parte presentation. Please associate this notification with the record in each of those proceedings.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Claudia Fox (w/o attachment)
William Agee (w/o attachment)
Jake Jennings (w/o attachment)

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Washington, D.C. 20036-3351

kathleen.levitz@bellsouth.com

Kathleen B. Levitz
Vice President-Federal Regulatory

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Fax 202 463-4198

January 14, 2000

WRITTEN EX PARTE

Ms. Claudia Fox
Policy and Program Planning Division
Common Carrier Bureau
Room 5-C235
Federal Communications Commission
The Portals
445 12th St. S.W.
Washington, D.C. 20554

Re: CC Docket No. 98-121 and CC Docket No. 99-295

Dear Ms Fox:

Attached is a copy of an Order in its Docket No. 8354-U that the Georgia Public Service Commission adopted on January 12, 2000. The Order directs BellSouth to file Supplemental Test Plan to add to the Georgia-BellSouth OSS Master Test Plan designed to:

1. Assess the Electronic Interface Change Control Process as applied to the implementation of OSS '99;
2. Evaluate the current pre-ordering, ordering, and provisioning of xDSL capable loops;
3. Perform functional testing of resale pre-ordering, ordering, provisioning, maintenance, and repair billing transactions for the top 50 electronically orderable retail services available for resale that have not experienced significant commercial usage; and
4. Evaluate processes and procedures for the collection and calculation of performance data.


The Order requires BellSouth to file the proposed Supplemental Test Plan by January 22, 2000, and interested parties to file comments on the proposed plan 7 days later.

I am sending a copy of the Order to you in response to the request that BellSouth share with you changes or status reports related to the third party

testing program currently underway in Georgia. If you have any questions after reviewing the revision, please call me at 202.463.4113.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, for each of the dockets identified above, I am filing two copies of this written ex parte presentation with the Secretary of the Commission and requesting that it be associated with the record in those dockets.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen B. Levitz".

Kathleen B. Levitz

Attachment

cc: William Agee
Jake Jennings

COMMISSIONERS:

STAN WISE, CHAIRMAN
ROBERT B. BAKER, JR.
DAVID L. BURGESS
BOB DURDEN
LAUREN "BUBBA" McDONALD, JR.



DEBORAH K. FLANNAGAN
EXECUTIVE DIRECTOR

HELEN O'LEARY
EXECUTIVE SECRETARY

Georgia Public Service Commission

47 TRINITY AVENUE, S.W.
ATLANTA, GEORGIA 30334-5701
(404) 656-4501 OR 1 (800) 282-5813
FAX: (404) 656-2341 www.psc.state.ga.us

RECEIVED

JAN 12 2000

EXECUTIVE SECRETARY
G.P.S.C.

IN RE: Docket No. 8354-U: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems, Consideration of AT&T's Motion for Reconsideration of the Commission's Order for Third Party Testing

ORDER

In an Order issued on May 20, 1999, in this docket, the Georgia Public Service Commission ("Commission") established a Third Party Testing program of BellSouth Telecommunications, Inc.'s ("BellSouth's") Operational Support Systems ("OSS") in response to a petition filed by a coalition of Competitive Local Exchange Carriers ("CLECs"). The Commission concluded that it was appropriate to conduct an audit of those areas in which BellSouth had not yet experienced significant usage. In arriving at this conclusion, the Commission established a testing plan designed to allow the a thorough yet efficient audit to be conducted of BellSouth's OSS, which ultimately would provide the Commission with the additional information needed to render an informed opinion whether BellSouth met its OSS obligations under Section 271 of the 1996 Telecommunications Act. Over the past seven months, KPMG & Hewlett-Packard have been in the process of implementing the directives contained in the Master Test Plan that was approved by the Commission on June 15, 1999.

On September 27, 1999, Lawrence E. Strickling, Chief of the Common Carrier Bureau of the Federal Communications Commission ("FCC"), sent a letter to US West, Inc. regarding Third Party Testing of OSS systems. The stated purpose of his letter was to provide guidance regarding important criteria that a third-party test should include to assist the FCC in determining whether a Bell Operating Company ("BOC") is providing nondiscriminatory access to its OSS. In total, the letter addressed seven major areas, which include: (1) performance measure evaluation; (2) change management testing; (3) xDSL testing; (4) normal, high and stress volume testing; (5) pseudo-CLEC testing; (6) dissemination of information; and (7) functionality.

On November 5, 1999, AT&T Communications of the Southern States, Inc. ("AT&T") filed a document containing a motion urging the Commission to modify facets of its Master Plan. Thereafter, AT&T, Rhythms Link, Inc. and Sprint Communications

Company, L.P. filed comments on November 15, 1999, November 16, 1999, and November 22, 1999, respectively, seeking an expansion of the existing Master Test Plan based upon their individual interpretations of the Strickling letter.

The Commission finds that BellSouth shall initiate additional testing of its OSS in the manner set forth in more detail below. The additional testing shall be supplemental to the Current Testing Plan that was previously approved by this Commission. KPMG & Hewlett-Packard shall complete the Current Testing Plan as scheduled.

The Commission finds that BellSouth shall file within ten (10) days after the effective date of this Order a detailed proposed Supplemental Test Plan. This proposed Supplemental Test Plan shall be designed to accomplish the following objectives:

- 1) Assess the Electronic Interface Change Control Process as applied to the implementation of OSS '99;
- 2) Evaluate the current pre-ordering, ordering, and provisioning of xDSL capable loops;
- 3) Perform functional testing of resale pre-ordering, ordering, provisioning, maintenance, and repair billing transactions for the top 50 electronically orderable retail services available for resale that have not experienced significant commercial usage; and
- 4) Evaluate processes and procedures for the collection and calculation of performance data.

As stated previously, the Commission focused its test plan on those areas in which BellSouth had yet to experience significant commercial usage. In Docket 6352-U, the Commission ordered BellSouth to make available for resale at a discount all retail services sold to non-telecommunication providers. BellSouth developed technical descriptions for 50 of its top retail services that are available for CLECs to resell. In Georgia, CLECs have been ordering significant commercial volumes of some resale services as evidenced in the BellSouth monthly Performance Measures filed with this Commission. Therefore, to meet Objective 3, BellSouth should perform end-to-end testing only of the top 50 electronically orderable retail services available for resale that have not experienced significant commercial usage. This will ensure the resale services that are not currently being ordered will be tested for functionality. BellSouth's proposed Supplemental Test Plan shall include the order volume for all 50 of the top resale services that are electronically orderable and shall identify which of these services BellSouth considers to have significant commercial usage.

WHEREFORE, it is

ORDERED, that the request made by AT&T urging the Commission to modify aspects of its Master Plan is hereby granted in the manner set forth herein;

ORDERED FURTHER, that KPMG & Hewlett-Packard shall complete the existing test previously approved by they Commission;

ORDERED FURTHER, that BellSouth shall file within 10 days after the filing date of this Order a detailed proposed Supplemental Test Plan that accomplishes the following objectives:

- 1) Assesses the Electronic Interface Change Control Process as applied to the implementation of OSS '99;
- 2) Evaluates the current pre-ordering, ordering, and provisioning of xDSL capable loops;
- 3) Performs functional testing of resale pre-ordering, ordering, provisioning, maintenance, and repair billing transactions for the top 50 electronically orderable retail services available for resale that have not experienced significant commercial usage; and
- 4) Evaluates processes and procedures for the collection and calculation of performance data.

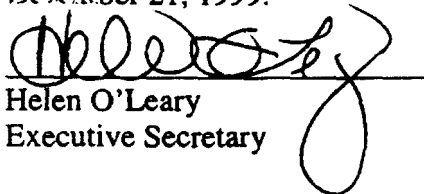
ORDERED FURTHER, that interested parties shall file comments 7 days after filing of the proposed Supplemental Test Plan.

ORDERED FURTHER, that the proposed Supplemental Test Plan shall be subject to Commission approval.

ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over these matters is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

The above action of the Commission during its Administrative Session on December 21, 1999.


Helen O'Leary
Executive Secretary

01/12/00
DATE


Stan Wise
Chairman

1-12-00
DATE